

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Donna Streier,

Plaintiff,

v.

Enhanced Recovery Company, LLC,

Defendant.

Court File No. 14-CV-3056 (JRT/HB)

**DEFENDANT ENHANCED RECOVERY
COMPANY, LLC'S MOTION
TO EXTEND TIME TO ANSWER**

MOTION TO EXTEND TIME TO ANSWER

Defendant Enhanced Recovery Company, LLC ("ERC"), by and through undersigned counsel, hereby moves this Court for an Order:

1. Extending the time to answer pursuant to Federal Rule of Civil Procedure 6(b)(1)(B); or if necessary,
2. Granting leave, under Federal Rule of Civil Procedure 60(b)(1), for ERC to file an answer after the expiration of the time to answer on the grounds of excusable neglect and because no default judgment has been entered against ERC in the above-captioned action; or if necessary in the alternative,
3. Granting leave, under Federal Rule of Civil Procedure 55, for ERC to file an answer after the expiration of the time to answer on the grounds of excusable neglect and because no default judgment has been entered against ERC in the above-captioned action; and,

4. For such other and further relief as the Court may deem just and equitable.

This Motion is supported by the Memorandum of Law filed in support of ERC's Motion to Extend Time to Answer, the Declarations of Rocky Landoll, Scott Gallagher, and James V. F. Dickey and attached exhibits, and arguments of counsel.

Dated: October 27, 2014.

MOHRMAN, KAARDAL & ERICKSON, P.A.

/s James V. F. Dickey

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